

KELLER BENVENUTTI KIM LLP
Jane Kim (#298192)
(jkim@kbbkllp.com)
Thomas B. Rupp (#278041)
(trupp@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 364 6793
Fax: 650 636 9251

*Attorneys for Debtor and
Debtor in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

In re:

JADOOTV, INC.,

Debtor.

Bankruptcy Case No. 19-41283 (WJL)

Chapter 11

**DEBTOR'S STATEMENT FOR APRIL 29,
2020 STATUS CONFERENCE**

Date: April 29, 2020

Time: 10:30 a.m. (Pacific Daylight Time)

Place: **(Telephonic Appearances Only)**

United States Bankruptcy Court

Courtroom 220

1300 Clay Street

Oakland, CA 94612

JadooTV, Inc. (“JadooTV” or the “Debtor”), as debtor and debtor in possession in the above-captioned chapter 11 case (the “Chapter 11 Case”), hereby submits this statement respecting the status of the Chapter 11 Case in advance of the April 29, 2020 status conference.

Operations

The Debtor continues to operate its business in the ordinary course. The most recent monthly operating report for March 2020 shows stable revenues and sufficient cash on hand to conduct operations and support the administrative costs of this Chapter 11 Case. The Debtor is current on its payment of United States Trustee Quarterly Fees.

Office Lease

In March 2020, the Debtor decided to reject the lease for its office and operate entirely on a remote working basis. Due to the public health orders in place for the COVID-19 pandemic, the Debtor is unable to remove its personal property from the leased premises. As of this filing, it is being widely reported that the shelter-in-place order for Alameda County will extend through the end of May. The Debtor intends to remove its property and effect an orderly surrender of the premises to the landlord as soon as the local orders are relaxed and public health and safety allow. The motion to reject the lease is set to be heard concurrently with this status conference.

DISH Litigation

On February 11, 2020, JadooTV and Defendant Sajid Sohail filed a motion to transfer venue of the Copyright Action to the Northern District of California. Copyright Action, Dkt. No. 139. On March 16, 2020, the Honorable Fernando M. Olguin granted the motion to transfer and transferred the case to the Northern District of California. Copyright Action, Dkt. No. 150. In the same March 16, 2020 order, Judge Olguin also dismissed the suit against Defendant Haseeb Shah without prejudice on the grounds that the court lacked personal jurisdiction over Defendant Shah.

The case was transferred to the Northern District of California on March 18, 2020, and was initially assigned to the Honorable Laurel Beeler, with the new case number 3:20-cv-01891-CRB. Copyright Action, Dkt. No. 153. DISH filed a declination to proceed before a magistrate judge, and the

case was then reassigned to the Honorable Charles R. Breyer. Copyright Action, Dkt. No. 159. The Initial Case Management Conference is set for September 11, 2020 before Judge Breyer.

On April 17, 2020, Defendant Sajid Sohail filed a motion for judgment on the pleadings. Copyright Action, Dkt. No. 167. This motion is set to be heard on June 26, 2020 before Judge Breyer.

The Patent Action (Case No. 5:18-cv-05214-EJD) remains subject to the automatic stay. On February 20, 2020, the Honorable Edward J. Davila issued an order directing the Clerk of the Court to administratively close the file. Patent Action, Dkt. No. 49.

Prospects for Resolution

The Debtor has not yet filed a plan of reorganization. The significant contingency presented by the Copyright Action will likely determine the resolution of this Chapter 11 Case. The Debtor anticipates that its current operations and revenue will allow it to maintain the status quo and continue paying administrative expenses as it awaits a decision on the motion for judgment on the pleadings in the Copyright Action.

Dated: April 27, 2020

Respectfully submitted,

KELLER BENVENUTTI KIM LLP

By: /s/ Thomas B. Rupp
Thomas B. Rupp

Attorneys for Debtor and Debtor in Possession